

**ATTACHMENT 3**

**INSPECTIONS**

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## **1.0 Introduction**

The inspections outlined in this Attachment are the minimum required. All inspections required by this permit will be documented on forms and maintained as part of the operating record. The forms are not included in this Attachment, but a list of all required inspection items, frequencies, and what is being inspected is included as an Inspection Matrix. Although the format of the inspection forms may change, all items on the Inspection Matrix will be included on the forms and inspected.

All inspections are documented and the documentation is maintained at the Clive facility. Reports may be maintained electronically as long as a legible hard copy can be produced. All inspection forms will note the day, the inspector's name, the time of the inspection, any deficiencies found or corrective action taken and the work order number that indicates that a repair request has been submitted. If the repair is minor and the inspector can fix it (such as by replacing a sign, or getting another fire extinguisher) the notation of what was done will be made on the form rather than referencing a work order number. All items on the inspection logs will be filled in (i.e., no blanks). If a particular item is not applicable for some reason, it will be noted on the form along with the reason.

## **2.0 Frequency of Inspections**

The Inspection Matrix specifies the minimum frequency of inspection for each required item.

## **3.0 Types of Problems**

The personnel conducting the inspections shall be trained on the types of problems they should be looking for. Inspection instructions may be specified on the inspection form itself, or they may be specified in instructions that will accompany the applicable log. These instructions shall be developed with sufficient detail to avoid inconsistencies and confusion between inspections and log entries between different inspectors. These instructions will be in place for all items on the Inspection Matrix.

Any item currently out-of-service and active work orders will be listed on the inspection forms and maintained in the operating record. A historical list of out-of-service items or work orders will also be maintained on paper or electronically.

## **4.0 Sumps and Secondary Containment Areas**

Sumps, secondary containment, and the Temporary Storage Pad are inspected daily when the facility is staffed to determine if they contain liquids or other material.

If a sump, secondary containment area, or the Temporary Storage Pad contains any material, it will be emptied or removed within 24 hours of discovering the contents. Specifically, all material, liquid and/or solid, will be removed. If ongoing precipitation prevents the emptying of all material from a sump or secondary containment system located outside of a building, the sump or secondary containment system will be emptied within 24 hours of the end of the precipitation event. If this occurs, an explanation to this effect, and the time and date of the end of the precipitation event will be noted on the inspection forms. However, sufficient material must be removed during the event to maintain sufficient secondary containment capacity of the

system. Solid material that accumulates in sumps inside buildings from the routine operations (e.g., dried mud falling off of pallets, small pieces of wood from pallets, dust, etc. (but not spill material)) will be noted on the daily inspection forms but may be removed weekly.

Any material removed will be managed as a hazardous waste, with the exception of plant debris that may blow onto the exterior portion of Unit 106 or onto the Temporary Storage Area.

## **5.0 Corrective Action**

All items on the inspection logs will have a notation of their status (i.e., blanks will not be used to indicate that an item was acceptable or that the status had not changed). If the status is not acceptable, there will be a notation of the corrective actions performed (if it can be fixed immediately) or a reference to a work order if additional work needs to be done.

The method of documenting that a request for repair has been made is through the work order system. That same system is also used to indicate when the work has been completed. The form itself may change but will contain sufficient information to be able to clearly track all the work completed.

All work orders will clearly indicate the work that was performed. It will also indicate who performed the work. It will also clearly indicate that all of the required work is completed and the date of completion. If some of the work is done, but additional work is needed, this will be noted on the work order or reference additional work orders.

Any malfunction or deterioration discovered by an inspection shall be corrected within 72 hours. If the remedy requires more time, Northeast Casualty Real Property will submit to the Executive Secretary, before the expiration of the 72-hour period, a proposed time schedule for correcting the problem. All corrective actions will be completed in a timely manner. Until the problem is corrected, the equipment will be declared out-of-service. This will be noted on the inspection logs.

All deterioration shall be noted on the appropriate inspection forms and reported internally so that corrective action will be taken.

If a problem is discovered during an inspection where a hazard to human health or the environment is imminent or has already occurred, remedial action shall be taken immediately.

## **6.0 Inspection Matrix**

The items that will be inspected, the frequency of inspection, and a brief description of what is being inspected are contained in this section.

## INSPECTION MATRIX

Inspection Item	Minimum Frequency	Types of Problems
<b>Container Storage (Units 105, 106, 535 &amp; 604)</b>		
Unit 105 sumps	Daily when staffed	Empty
Unit 105 loading/unloading area	Daily when in use	Leaks, spills
Unit 105 loading/unloading area	Monthly	Visually free of cracks, gaps, damage
Unit 105 debris drum	Weekly	Closed, labeled, dated, <90 days
Unit 105 aisles	Weekly	Adequate
Unit 105 containers	Weekly	Bulging, leaking, corroding
Unit 105 containers	Weekly	Proper placement and stacking
Unit 105 containers	Weekly	Closed, bungs in
Unit 105 containers	Weekly	Labels intact and legible
Unit 105 railcar tankers	Weekly	Leaking, corroding
Unit 105 railcar tankers	Weekly	Closed
Unit 105 railcar tanker hoses	Daily when in use	Leaks, spills
Unit 105 railcars	Weekly	Labels intact and legible
Unit 105 pallets	Weekly	Provide 4" clearance
Unit 105 eyewash	Weekly	Operable

<b>Inspection Item</b>	<b>Minimum Frequency</b>	<b>Types of Problems</b>
Unit 105 shower	Weekly	Operable
Unit 105 waste segregation	Weekly	Incompatible check
Unit 105 floor, berms	Monthly	Visually free of cracks, gaps, damage
Unit 106 secondary containment	Daily when staffed	Empty
Unit 106 loading/unloading area	Daily when in use	Leaks, spills
Unit 106 aisles	Weekly	Adequate
Unit 106 containers/rolloff boxes	Weekly	Bulging, leaking, corroding
Unit 106 containers/rolloff boxes	Weekly	Proper placement and stacking
Unit 106 containers/rolloff boxes	Weekly	Closed (tarped/bungs in)
Unit 106 containers/rolloff boxes	Weekly	Labels intact and legible
Unit 106 pallets/containers	Weekly	Provide 4" clearance
Unit 106 eyewash	Weekly	Operable
Unit 106 shower	Weekly	Operable
Unit 106 waste segregation	Weekly	Incompatible check
Unit 106 floor, berms	Monthly	Visually free of gaps, cracks, damage
Unit 106 Spill Kit	Monthly	Verify contents
Unit 535 sumps	Daily when staffed	Empty

<b>Inspection Item</b>	<b>Minimum Frequency</b>	<b>Types of Problems</b>
Unit 535 loading/unloading area	Daily when in use	Leaks, spills
Unit 535 aisles	Weekly	Adequate
Unit 535 railcars/containers	Weekly	Bulging, leaking, corroding
Unit 535 containers	Weekly	Proper placement and stacking
Unit 535 railcars/containers	Weekly	Closed, bungs in
Unit 535 containers	Weekly	Labels intact and legible
Unit 535 containers/pallets	Weekly	Provide 4" clearance
Unit 535 eyewash	Weekly	Operable
Unit 535 shower	Weekly	Operable
Unit 535 waste segregation	Weekly	Incompatible check
Unit 535 floor, berm	Monthly	Visually free of cracks, gaps, damage
Unit 535 hoses/fittings	Daily when in use	Good condition; no leaks observed from rail tanker to truck tanker
Unit 535 piping	Daily when in use	No leaks observed from rail tanker to truck tanker
Unit 535 Spill Kit	Monthly	Verify contents
Unit 535 carbon filters	Monthly	Operable, carbon level, free of plugging, breakthrough
Unit 604 loading/unloading area	Daily when in use	Leaks, spills

Inspection Item	Minimum Frequency	Types of Problems
Unit 604 sumps	Daily when in use	Empty
Unit 604 sumps	Weekly	Concrete coating free of cracks and chips
Unit 604 rolloff boxes	Weekly	Leaking, corroding
Unit 604 rolloff boxes	Weekly	Closed/tarped
Unit 604 rolloff boxes	Weekly	Labels intact and legible
Unit 604 eyewash	Weekly	Operable
Unit 604 shower	Weekly	Operable
Unit 604 waste segregation	Weekly when in use	Incompatible check
Unit 604 floor, berms	Monthly	Visually free of cracks, gaps, damage
Unit 604 Spill Kit	Monthly	Verify contents
<b>Unit 255 – Bulk Solid Rail to Truck Transfer</b>		
Loading/unloading area	Daily when in use	Leaks, spills
Eyewash	Weekly	Operable
Shower	Weekly	Operable
Spill Kit	Monthly	Verify contents
Warning signs	Weekly	Are signs visible and legible?



Inspection Item	Minimum Frequency	Types of Problems
<b>Temporary Storage Pad</b>		
Loading/unloading area	Daily when in use	Leaks, spills, debris present
<b>Emergency Equipment</b>		
Emergency Generator	Weekly	Start generator, operable, check oil & gas
Primary electric fire pump	Weekly	Start pump, operable
Secondary diesel fire pump	Weekly	Start pump, operable
<b>Safety and Security</b>		
Fence	Weekly	All gates closed and locked, poles upright, no holes that would allow unauthorized entry
Warning signs	Weekly	Are signs secured to fence? Are signs visible and legible?
Perimeter lighting	Weekly	Check for lights working
All two-way radios and phones plant wide	Weekly	Functioning properly
All fire extinguishers plant wide	Monthly	Tagged, charged, in place, damaged
Evacuation drills	Quarterly	Check for proper response